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10 Attorneys for Receiver
11 ROBB EVANS & ASSOCIATES LLC

12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 FEDERAL TRADE COMMISSION,

15 Plaintiff,

16 v.

17 AWS, LLC, a Nevada limited liability
company; ADAMS CONSULTING, LLC, a
18 California limited liability company; FBA
DISTRIBUTORS, LLC, a Massachusetts
19 limited liability company; FBA STORES,
LLC, a Nevada limited liability company;
20 GLOBAL MARKETING SERVICES
L.L.C., a Nevada limited liability
company; INFO PROS, LLC, a Nevada limited liability
21 company; ONLINE AUCTION LEARNING
CENTER, INC., a Massachusetts
22 corporation; ONLINE AUCTION
LEARNING CENTER, INC., a Nevada
23 corporation; CHRISTOPHER F. BOWSER,
individually and as an officer of FBA
24 DISTRIBUTORS, LLC, FBA STORES,
LLC, INFO SOLUTIONS, LLC, ONLINE
25 AUCTION LEARNING CENTER, INC. and
26 ONLINE AUCTION LEARNING CENTER,
INC.; ADAM S. BOWSER, individually and
27 as an officer of AWS, LLC, FBA
DISTRIBUTORS, LLC, FBA STORES,
28 LLC, INFO SOLUTIONS, LLC, ONLINE

Case No.: 2:18-cv-00442-JCM-BNW

**STIPULATION FOR DISMISSAL WITH
PREJUDICE OF BANK OF AMERICA,
N.A.'S COMPLAINT-IN-INTERVENTION
PURSUANT TO SETTLEMENT**

[F.R. CIV. P. 41(a)(1)(A)(ii)]

1 AUCTION LEARNING CENTER, INC. and
2 ONLINE AUCTION LEARNING CENTER,
3 INC.; JODY L. MARSHALL, individually
4 and as an officer of INFO PROS, LLC and
5 INFO SOLUTIONS, LLC; and JEFFERY A.
6 GOMEZ, a/k/a JEFF ADAMS or JEFF
ADAM, individually and as an officer of
ADAMS CONSULTING, LLC and
GLOBAL MARKETING SERVICES
L.L.C.,

Defendants.

7 This Stipulation for Dismissal of Bank of America's Complaint-in-Intervention with
8 Prejudice Pursuant to Settlement ("Stipulation") is made by and among the Federal Trade
9 Commission ("FTC"), plaintiff in the underlying action, Bank of America, N.A. ("Bank"), the
10 party filing the Complaint-in-Intervention, and Robb Evans & Associates LLC as Receiver
11 ("Receiver") in reference to the following:

12 RECITALS

13 A. In September 2018, plaintiff Federal Trade Commission ("FTC") filed a
14 Stipulation and Order Allowing Bank of America, N.A. to Intervene and File Complaint-in-
15 Intervention ("Intervention Stipulation").

16 B. On September 27, 2018, the Court entered an order approving the Intervention
17 Stipulation and ordering the Bank's Complaint-in-Intervention filed (Doc. No. 96).

18 C. On September 28, 2018, the Bank filed its Complaint-in-Intervention (Doc. No.
19 97).

20 D. On October 5, 2018, the Receiver and the Bank entered into a stipulation
21 extending the deadline for the Receiver to respond to the Complaint-in-Intervention which was
22 approved by the Court by Order entered October 11, 2018 (Doc. No. 108).

23 E. On November 5, 2018, the FTC filed an answer to the Bank's Complaint-in-
24 Intervention (Doc. No. 109).

25 F. On November 20, 2018, the Receiver filed an answer to the Bank's Complaint-in-
26 Intervention (Doc. No. 110).

1
2 Dated: June 21, 2019

HOLLAND & HART LLP

3
4 By: /s/ Lars K. Evensen

Lars K. Evensen, Esq.
Nevada Bar No. 8061
Robert J. Cassity, Esq.
Nevada Bar No. 9779
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8 WYNN & WYNN, P.C.

Thomas E. Pontes
(Admitted *Pro Hac Vice*)
John D. Bowen
(Admitted *Pro Hac Vice*)

10 Attorneys for Bank of America, N.A.

11
12 Dated: June 21, 2019

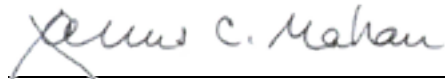
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14 DIAMOND MCCARTHY LLP
CHRISTOPHER D. SULLIVAN
LESLEY ANNE HAWES

16 By: /s/ Lesley Anne Hawes

Lesley Anne Hawes
Admitted *Pro Hac Vice*
Attorneys for Receiver
Robb Evans & Associates, LLC

20
21 IT IS SO ORDERED.

22 

23 UNITED STATES DISTRICT JUDGE

24 DATED: June 25, 2019

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2019, I caused the foregoing document to be served by the following means to the persons listed below:

☒ **CM/ECF electronic filing system:**

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☒ **By direct email (as opposed to through the ECF System)**

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J James C Bastian Jr. jbastian@shbllp.com

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 21, 2019.

/s/ Catherine Burrow

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